San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

FEB 2 8 2014

Mr. Aaron Jones
California State Prison - Corcoran
P O Box 8800
Corcoran, CA 93212-8800

Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # C-214
Project # C-1140310

Dear Mr. Jones:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This project is to upgrade Phase I vapor recovery system from two-point to Morrison Brothers EVR VR-402-B.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

San Joaquin Valley Air Pollution Control District

Authority to Construct
Application Review
Motor Vehicle Refueling-Gasoline Dispensing Facility

Facility Name:	California State Prison – Corcoran	Date:	February 25, 2014
Mailing Address:	P O Box 8800, Attn: Business Services	Engineer:	Robert Gilles
	Corcoran, CA 93212-8800	Lead Engineer:	Brian Clements
Contact Person:	Kathy Silsby, Rumex Construction Corp. (Consultant)		
Telephone:	(559) 271-3300 ext. 101		
Email:	kathys@rumexcc.com		
Application #:	C-214-46-2		
Project #:	C-1140310		
Deemed Complete:	February 25, 2014		

I. Proposal

California State Prison – Corcoran requests an Authority to Construct (ATC) to modify an existing non-retail motor vehicle gasoline dispensing operation with one 12,000 gallon split above ground storage tank (AST). The applicant proposes to upgrade Phase I vapor recovery system from two-point to Morrison Brothers EVR VR-402-B. See Appendix A: Current Permit to Operate

California State Prison - Corcoran received their Title V Permit on October 31, 2012. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. California State Prison – Corcoran must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4102	Nuisance (12/17/92)
Rule 4621	Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (12/19/13)
Rule 4622	Transfer of Gasoline into Vehicle Fuel Tanks (12/19/13)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The project is located at 4001 King Avenue in Corcoran, California. Pursuant to California Health and Safety Code 42301.6, since this project will not result in an increase in emissions, a school notice is not required.

IV. Process Description

Gasoline is delivered to the storage tank via a delivery vessel. Gasoline is then dispensed from the storage tank into motor vehicle tanks during vehicle refueling.

V. Equipment Listing

Pre-Project Equipment Description:

C-214-46-1: GASOLINE DISPENSING OPERATION WITH ONE 12,000 GALLON SPLIT (8,000 GALLON GASOLINE/4,000 GALLON DIESEL) ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM, AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162)

ATC Equipment Description:

C-214-46-2: MODIFICATION OF A GASOLINE DISPENSING OPERATION WITH ONE 12,000 GALLON SPLIT (8,000 GALLON GASOLINE/4,000 GALLON DIESEL) ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM, AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162): UPGRADE PHASE I VAPOR RECOVERY SYSTEM FROM TWO-POINT TO MORRISON BROTHERS EVR VR-402-B

Post Project Equipment Description:

C-214-46-2: GASOLINE DISPENSING OPERATION WITH ONE 12,000 GALLON SPLIT (8,000 GALLON GASOLINE/4,000 GALLON DIESEL) FIREGUARD ABOVEGROUND STORAGE TANK SERVED BY MORRISON BROTHERS EVR PHASE I VAPOR RECOVERY SYSTEM VR-402-B, STANDING LOSS CONTROL (VR-301-E), AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162-A)

See Appendix B: Supplemental Application

VI. Emission Control Technology Evaluation

The motor vehicle refueling operation will use Air Resources Board (ARB) certified Phase I and Phase II vapor recovery systems designed to reduce VOC emission by at least 95% during storage tank filling and 95% during motor vehicle refueling.

VII. General Calculations

A. Assumptions

- VOC is the only pollutant emitted from this operation.
- This facility may operate 24 hours per day, 365 days per year (worst case).
- Maximum daily gasoline dispensed at each fueling point (FP) is 1,800 gallons/FP-day (District GEAR 1 Policy).

B. Emission Factors

These emission factors were obtained from Appendix A - Emission Factors For Gasoline Stations published by CAPCOA Air Toxic "Hot Spots" Program in the Gasoline Service Station Industrywide Risk Assessment Guidelines dated December 1997.

1. Pre-Project Emission Factor (EF1)

VOC Emission Factors	
Emission Factor (EF1) (lb-VOC/1,000 gal)	Emission Source
0.42	Tank filling loss (95%)
0.053	Breathing Loss (A/G tank)
0.42	Vehicle fueling loss (95%)
0.42	Spillage
1.313	Total VOC Losses

The emission factor in terms of lb-VOC/FP-day can be calculated as follows:

EF1 = (1.313 lb-VOC/1,000 gal) x (1,800 gal/FP-day)
= 2.36 lb-VOC/FP-day

2. Post-Project Emission Factor (EF2)

VOC Emission Factors	
Emission Factor (EF2) (lb-VOC/1,000 gal)	Emission Source
0.17	Tank filling loss (98%)
0.053	Breathing Loss (A/G tank)
0.42	Vehicle fueling loss (95%)
0.42	Spillage
1.063	Total VOC Losses

The emission factor in terms of lb-VOC/FP-day can be calculated as follows:

EF2 = (1.063 lb-VOC/1,000 gal) x (1,800 gal/FP-day)
= 1.91 lb-VOC/FP-day

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Daily Emissions:

Daily PE1 = Number of FP x EF1 lb-VOC/FP-day
= 1 FP x 2.36 lb-VOC/FP-day
= 2.4 lb-VOC/day

Annual Emissions:

Annual throughput (gal/yr) = Number of FP x 1,800 (gal/FP-day) x 365 (days/yr)
= 1 x 1,800 (gal/FP-day) x 365 (days/yr)
= 657,000 gal/yr

Annual PE1 = Annual throughput (gal/yr) x EF1 (lb-VOC/1,000 gal)
= 657,000 (gal/yr) x 1.313 (lb-VOC/1,000 gal)
= 863 lb-VOC/yr

2. Post Project Potential to Emit (PE2)

Daily Emissions:

Daily PE2 = Number of FP x EF2 lb-VOC/FP-day
= 1 FP x 1.91 lb-VOC/FP-day
= 1.9 lb-VOC/day

Annual Emissions:

Annual throughput (gal/yr) = Number of FP x 1,800 (gal/FP-day) x 365 (days/yr)
= 1 x 1,800 (gal/FP-day) x 365 (days/yr)
= 657,000 gal/yr

Annual PE2 = Annual throughput (gal/yr) x EF2 (lb-VOC/1,000 gal)
= 657,000 (gal/yr) x 1.063 (lb-VOC/1,000 gal)
= 698 lb-VOC/yr

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The SSPE1 value in the table below is from project C-1113296.

Pre-Project Stationary Source Potential to Emit (SSPE1)	
	VOC (lb/year)
Total SSPE1	20,493

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

With this project, there will be a decrease in VOC emissions for permit unit C-214-46-2. The SSPE2 is calculated in the table below.

Pre-Project Stationary Source Potential to Emit (SSPE1)	
	VOC (lb/year)
Total SSPE1	20,493
C-214-46-1	-863
C-214-46-2	698
Total SSPE2	20,328

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)	
	VOC
SSPE1	20,493
SSPE2	20,328
Major Source Threshold	20,000
Major Source?	Yes

As seen in the table above, the facility is an existing Major Source and will remain a Major Source for VOC emissions as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21(b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
	NO_2	VOC	SO_2	CO	PM	PM_{10}	CO_2e
Estimated Facility PE before Project Increase	10.6	10.2	0.5	14.8	8.5	8.5	831.8
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source? (Y/N)	N	N	N	N	N	N	N

As shown above, the facility is not an existing major source for PSD for any one pollutant; therefore, the facility is not an existing major source for PSD. Refer to Appendix E for sources of the values in the above table.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

a. BE VOC

Clean Emissions Unit, Located at a Major Source
Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

This emissions unit is equipped with CARB certified Phase I and Phase II vapor recovery systems, which meets the requirements for achieved-in-practice BACT under BACT Guideline 4.6.1 (see Appendix C). Therefore, BE=PE1.

BE = PE1 = Annual throughput (gal/yr) x EF1 (lb-VOC/1,000 gal)
= 657,000 (gal/yr) x 1.313 (lb-VOC/1,000 gal)
= 863 lb-VOC/yr

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is a major source for VOC, the project's PE2 is compared to the SB 288 Major Modification Threshold in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
VOC	698	50,000	No

Since the SB 288 Major Modification Threshold is not surpassed with this project, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Step 1

For existing emissions units, the increase in emissions is calculated as follows.

Emission Increase = PAE – BAE - UBC

Where: PAE = Projected Actual Emissions, and
BAE = Baseline Actual Emissions
UBC = Unused baseline capacity

If there is no increase in design capacity or potential to emit, the PAE is equal to the annual emission rate at which the unit is projected to emit in any one year, selected by the operator, within 5 years after the unit resumes normal operation. If detailed PAE are not provided, the PAE is equal to the PE2 for each permit unit.

The BAE is calculated based on historical emissions and operating records for any 24 month period, selected by the operator, within the previous 10 year period. The BAE must be adjusted to exclude any non-compliant operation emissions and emissions that are no longer allowed due to lower applicable emission limits that were in effect when this application was deemed complete.

The project's combined total emission increases are compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
NO_x*	0	0	No
VOC*	0	0	No

*If there is any emission increases in NO_x or VOC, this project is a Federal Major Modification and no further analysis is required.

Since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO_2 (as a primary pollutant)
- SO_2 (as a primary pollutant)
- CO
- PM
- PM_{10}
- Greenhouse gases (GHG): CO_2, N_2O, CH_4, HFCs, PFCs, and SF_6

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

In the case the facility is a new source, the second step of the PSD evaluation is to determine if this new facility will become a new PSD major Source as a result of the project and if so, to determine which pollutant will result in a PSD significant increase.

I. Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21(b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

PSD Major Source Determination: Potential to Emit (tons/year)							
	NO_2	VOC	SO_2	CO	PM	PM_{10}	CO_2e
Total PE from New and Modified Units	0	0.35	0	0	0	0	0
PSD Major Source Threshold	250	250	250	250	250	250	100,000
New PSD Major Source?	N	N	N	N	N	N	N

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore, Rule 2410 is not applicable and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. The QNEC is calculated by dividing the annual Increase in Potential Emissions (IPE) by 4 calendar quarters per year, as shown in the following table:

QNEC				
Pollutant	PE1 (lb/yr)	PE2 (lb/yr)	IPE (lb/yr)	QNEC (lb/qtr)
VOC	863	698	-165.00	-41.25

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

Since the applicant is proposing to install ARB certified Phase I and Phase II vapor recovery systems which meet BACT for this type of operation, no BACT calculations are needed (see Appendix C).

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)	
	VOC
SSPE2	20,328
Offset Threshold	20,000
Offsets Triggered?	Yes

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for VOC and the SSPE2 is greater than the offset thresholds. Therefore, offset calculations will be required for this project.

The quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project

Where,
PE2 = Post Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = HAE

As calculated in Section VII.C.6 above, the BE from this unit is equal to the PE1 since the unit is a Clean Emissions Unit. Also, there is only one emissions unit associated with this project and there are no increases in cargo carrier emissions. Therefore, offsets can be determined as follows:

Offsets Required (lb/year) = ([PE2 – BE] + ICCE) x DOR

PE2 (VOC) = 698 lb/year
BE (VOC) = 863 lb/year
ICCE = 0 lb/year

Offsets Required (lb/year) = ([698 – 863] + 0) x DOR
= -165 => 0 lb VOC/year

As demonstrated in the calculation above, the amount of offsets required is zero. Therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
c. Any project which results in the offset thresholds being surpassed, and/or
d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore, public noticing is not required for this project for PE > 100 lb/day.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
VOC	20,493	20,328	20,000 lb/year	No

As detailed above, the VOC offset threshold was not surpassed with this project; therefore, public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
VOC	20,328	20,493	-165	20,000 lb/year	No

As demonstrated above, the SSIPE for VOC is less than 20,000 lb/year; therefore, public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements of this rule. Therefore, public notice will not be required for this project.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

For the motor vehicle refueling operation the DEL is established by the number of fueling points and the emission factor as shown in Section VII of this document. In addition, the following permit condition will be placed on the ATC to ensure compliance:

- {4011} The gasoline throughput for this permit unit shall not exceed 657,000 gallons in any one calendar year. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

Source testing is required by District Rules 4621, *Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants*, and 4622, *Transfer of Gasoline into Vehicle Fuel Tanks*. Since this gasoline dispensing operation is subject to the source testing requirements of these rules, these requirements will be discussed in Section VIII of this evaluation.

2. Monitoring

Monitoring is required by District Rules 4621, *Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants*, and 4622, *Transfer of Gasoline into Vehicle Fuel Tanks*. Since this gasoline dispensing operation is subject to the monitoring requirements of these rules, these requirements will be discussed in Section VIII of this evaluation.

3. Recordkeeping

Recordkeeping is required by District Rules 4621, *Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants*, and 4622, *Transfer of Gasoline into Vehicle Fuel Tanks*. Since this gasoline dispensing operation is subject to the recordkeeping requirements of these rules, these requirements will be discussed in Section VIII of this evaluation.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and

5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to

operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, the following condition will be listed on the ATC to ensure compliance:

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

Motor vehicle refueling facilities equipped with both Phase I and Phase II vapor recovery systems satisfy the District's BACT requirement for air toxic control, and the District has determined the health risk impact from such sources are insignificant. Therefore, a health risk assessment will not be required. Compliance with this rule is expected.

Rule 4621 Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants

This rule applies to storage containers located at bulk plants with capacities greater than 250 gallons and less than 19,800 gallons; to other stationary storage containers with capacities greater than 250 gallons; and to those storage containers that are not subject to the control requirements of Rule 4623 (Storage of Organic Liquids) Section 5.0. The rule also applies to gasoline delivery vessels.

Section 5.1 states "loading equipment and vapor collection equipment shall be installed, maintained, and operated such that it is leak-free, with no excess organic liquid drainage at disconnect."

Section 3.19.2 defines a leak as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with the test method in Section 6.4.2. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component or equipment into a container is not considered sampling of a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3913} The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622]

- {3914} A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622]

Section 5.2.1 states "no person shall transfer, or permit the transfer, of gasoline from any delivery vessel into any stationary storage container subject to the requirements of this rule unless such container is equipped with an ARB certified permanent submerged fill pipe and utilizes an ARB certified Phase I vapor recovery system that is maintained and operated according to manufacturer specifications and the applicable ARB Executive Order." Since the facility is proposing to install ARB certified Phase I vapor recovery system, requirements of this section are satisfied and compliance is expected.

In addition, ARB has the additional certification requirements, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4252} The Phase I, Phase II, and Standing Loss Control Vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622 and CH&SC 41950]

Section 5.4.1 states "all aboveground storage containers shall be constructed and maintained in a leak-free condition." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {3980} The storage container(s) shall be installed, maintained, and operated such that they are leak-free. [District Rule 4621]

Section 5.4.4 states "operators of an aboveground storage container not located at a bulk plant shall conduct and pass the performance test specified in Sections 6.4.8 to determine compliance at least once every 36 months, (no more than 30 days before or after the required performance test date) unless otherwise required under ARB Executive Order." Section 6.4.8 specifies the "Static Leak Test for Aboveground Tanks" using ARB Test Procedure TP-206.3 or ARB Test Procedure TP-201.3B as applicable.

Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4435} The permittee shall perform and pass a Static Leak Test "Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Tanks" in accordance with the Executive Order specified in this permit for the Phase I Vapor Recovery System within 60 days after initial start-up and at least once every 12 months thereafter. [District Rules 4621 and 4622]

Section 5.5 states "All Phase I vapor recovery systems shall be inspected according to the frequency specified in Table 1. The person conducting the inspections shall, at a minimum, verify that the fill caps and vapor caps are not missing, damaged, or loose, that the fill cap gasket and vapor cap gaskets are not missing or damaged, that the fill adapter and vapor adapter are securely attached to the risers, that, where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing, and the dry break (poppet-valve) is not missing or damaged and that the submerged fill tube is not missing or damaged." Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3923} The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622]

- {3924} Periodic maintenance inspections of the Phase I vapor recovery system shall include, at a minimum, verification that 1) the fill caps and vapor caps are not missing, damaged, or loose; 2) the fill cap gasket and vapor cap gaskets are not missing or damaged; 3) the fill adapter and vapor adapter are securely attached to the risers; 4) where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing; 5) the dry break (poppet-valve) is not missing or damaged; and 6) the submerged fill tube is not missing or damaged. [District Rule 4621]

Section 5.7.2 states "no person shall operate, or allow the operation of a delivery vessel unless valid State of California decals which attest to the vapor integrity of the container are displayed." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {3915} No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621]

Section 6.1.4 states "all records required to demonstrate compliance with the requirements of this rule shall be retained on the premises for a minimum of five years and made available on site during normal business hours to the APCO, ARB, or EPA, and submitted to the APCO, ARB, or EPA upon request." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {4010} The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622]

- {3975} All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622]

Section 6.2.4 states "Operators shall notify the District at least seven days prior to any performance testing." Section 6.2.5 states "Operators shall submit all performance test results to the District within 30 days of test completion." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3968} The permittee shall notify the District at least 7 days prior to each performance test. The test results shall be submitted to the District no later than 30 days after the completion of each test. [District Rule 4621]

Section 6.3.1 states "Installation and maintenance contractors shall be certified by the ICC for Vapor Recovery System Installation and Repair (VI) and make available onsite proof of ICC certification for VI, and have and make available on site proof of any and all certifications required by the applicable ARB Executive Order and installation and operation manual in order to install or maintain specific systems, or work under the direct and personal supervision of an individual physically present at the work site who possesses and makes available onsite a current certificate from the ICC, indicating he or she has passed the VI exam and all certifications required by the applicable ARB Executive Order." Section 6.3.2 states "All ICC certifications shall be renewed every 24 months by passing the appropriate exam specific to the certification being sought." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4014} A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622]

- {4016} Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622]

Section 6.3.3 states "Gasoline Dispensing Facility Testers wishing to conduct vapor recovery system testing and repair at facilities located within the District, shall be in full compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification)." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {4005} A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622]

Rule 4622 Transfer of Gasoline into Vehicle Fuel Tanks

This rule applies to any gasoline storage and dispensing operation or mobile fueler from which gasoline is transferred into motor vehicle fuel tanks, except as provided in Section 4.0.

Section 3.29 defines a retail gasoline outlet as an establishment at which gasoline is sold or offered for sale to the general public for use in motor vehicles. Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {1993} This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 4622]

Section 5.1 states "a person shall not transfer or permit the transfer of gasoline from any stationary storage container, or from any mobile fueler with a capacity greater than 120 gallons, into a motor vehicle fuel tank with a capacity greater than 5 gallons, unless the gasoline dispensing unit used to transfer the gasoline is equipped with and has in operation an ARB certified Phase II vapor recovery system."

Section 5.1.1 states "all ARB certified Phase II vapor recovery systems shall be maintained according to ARB certifications and the manufacturer specifications applicable to the system." Since the facility is proposing to install ARB certified Phase II vapor recovery system, requirements of this section are satisfied and compliance is expected.

In addition, ARB has the additional certification requirements, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {4252} The Phase I, Phase II, and Standing Loss Control Vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622 and CH&SC 41950]

Section 5.1.2 states "all ARB certified Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method in Section 6.5.4." Section 6.5.4 states "detection of leaks shall be in accordance with EPA Test Method 21." Section 3.20 defines a leak as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with the test method in Section 6.5.4. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from a component or equipment into a container is not considered sampling of a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. Therefore, the

following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3913} The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622]

- {3914} A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622]

Section 5.2.1 states "any gasoline dispensing system subject to this rule shall comply with the provisions of this rule at the time of installation." Section 5.2.2 states "operators shall have all underground storage container installations and all underground piping configurations inspected by the APCO prior to backfilling. The operator shall notify the District by telephone or other District-approved method and obtain a confirmation number at least three business days prior to the backfilling."

Per District's policy, the aboveground tanks with balance Phase II vapor recovery system are not allowed to have a remote dispenser. Any dispenser that is more than two feet away from the tank is considered a remote dispenser. It is very unlikely for a non-remote dispenser to have underground vapor pipes and instead most of the aboveground tanks with balance Phase II systems have top or side mounted dispensers. Therefore, no underground piping is involved with this project and this section does not apply.

Section 5.2.3 states "installation and maintenance contractors shall, be certified by the ICC for Vapor Recovery System Installation and Repair, renew the ICC certification for Vapor Recovery System Installation and Repair every 24 months, make available onsite proof of ICC certification, and have and make available on site proof of any and all certifications required by the Executive Order and installation and operation manual in order to install or maintain specific systems." Section 5.2.4 states "in lieu of complying with Sections 5.2.3.1 through 5.2.3.4, installation and maintenance contractors may work under the direct and personal supervision of an individual physically present at the work site who possesses and makes available on site current certifications from the ICC, indicating he or she has passed the ICC Vapor Recovery System Installation and Repair exam and all other certifications required by the applicable ARB Executive Order." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4014} A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622]

- {4016} Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622]

Section 5.3.1 states "the owner or operator of an ARB certified Phase II vapor recovery system shall conduct periodic maintenance inspections to ensure that components of the vapor recovery system are in proper operating condition."

Section 5.3.2 states "the frequency of inspections shall be based on the operation's largest monthly gasoline throughput from the previous calendar year as indicated in Table 1."

Section 5.3.3 states "the frequency of vapor path inspections shall be based on the amount of gasoline dispensed by the operation in a calendar month as indicated in Table 1."

Section 5.3.4 states "the person conducting the inspections shall at a minimum, verify that the fueling instructions required by Section 5.5 are clearly displayed with the appropriate toll-free complaint phone number and toxic warning signs, that the following nozzle components are in place and in good condition as specified in ARB Executive Orders: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, hold open latch, that the hoses are not torn or crimped, that the vapor path of coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid, or as required by the applicable ARB Executive Order, and that the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit." Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3923} The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622]

- {4628} Periodic maintenance inspections of the Phase II vapor recovery system shall include, at a minimum, verification that 1) the following nozzle components are in place and in good condition as specified in ARB Executive Order as applicable: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, and hold open latch (unless prohibited by law or the local fire control authority); 2) the hoses are not torn, flattened or crimped; 3) the vapor path of the coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid if applicable; and 4) the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit. [District Rule 4622]

Section 5.4.1 states "no person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect, until: The defect has been repaired, replaced, or adjusted as necessary to correct the defect; The District has been notified, and the District has reinspected the system or authorized the system for use. Such authorization shall not include the authority to operate the equipment prior to the correction of the defective components; and

all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3917} No person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect or an equipment defect that is identified in any applicable ARB Executive Order until the following conditions have been met: 1) the defect has been repaired, replaced, or adjusted as necessary to correct the defect; 2) the District has been notified, and the District has reinspected the system or authorized the system for use (such authorization shall not include the authority to operate the equipment prior to the correction of the defective components); and 3) all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual. [District Rule 4622]

Section 5.4.2 states "upon identification of any major defects, the owner or operator shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired."

Section 5.4.2.1 states "tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary."

Section 5.4.2.2 states "in the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use." Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3918} Upon identification of any major defects, the permittee shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired. Tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary. In the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use. [District Rule 4622]

Section 5.4.4 states "in the event of a separation due to a drive off, the owner or operator shall complete one of the following, unless otherwise specified in the applicable ARB Executive Order, and document the activities in accordance with Section 6.2, before placing the affected equipment back in service:"

1) Conduct a visual inspection of the affected equipment, perform qualified repairs on any damaged components, and conduct applicable re-verification tests pursuant to Sections 6.5.1.1 and 6.5.1.4, or"
2) Conduct a visual inspection of the affected equipment and replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified, before placing affected equipment back in service."

Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3926} In the event of a separation due to a drive off, the permittee shall, unless otherwise specified in the applicable ARB Executive Order, conduct a visual inspection of the affected equipment and either 1) perform qualified repairs on any damaged components and conduct applicable re-verification tests pursuant to the requirements of this permit, or 2) replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified. The activities shall be documented in accordance with the requirements of this permit before placing the affected equipment back in service. [District Rule 4622]

Section 5.12 states "liquid condensate traps shall be used, if necessary, to keep the vapor return piping clear of any liquid blockage from the remote dispenser to the aboveground storage tank or when it is not possible to achieve the necessary slope from the dispenser to the underground storage tank."

Section 5.12.1 states "Liquid condensate traps shall be used only when the minimum slope requirements of 1/8 inches per foot of run cannot be met due to the topography."

Section 5.12.2 states "When liquid condensate traps are installed on gasoline dispensing systems equipped with an ARB certified Phase II enhanced vapor recovery system, they shall meet the following requirements:

5.12.2.1 Maintained vapor tight;

5.12.2.2 Accessible for inspection upon request;

5.12.2.3 Capable of automatic evacuation of liquid; and

5.12.2.4 Equipped with an alarm system in case of failure of the evacuation system."

Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {4614} If a Liquid Condensate Trap is installed, the permittee shall perform and pass a Liquid Condensate Trap Compliance Test using the test procedure defined in the Executive Order specified in this permit for the Phase II Vapor Recovery System within 60 days after initial startup and at least once every 12 months thereafter. [District Rule 4622]

- {4651} If a Liquid Condensate Trap is installed it shall be (1) maintained without leaks; (2) accessible for inspection upon request; (3) capable of automatic evacuation of liquid; and (4) equipped with an alarm system in case of failure of the evacuation system. [District Rule 4622]

Section 6.2.1 states "operators shall retain the test result verification that each ARB certified Phase II vapor recovery system meets or exceeds the requirements of the tests specified in

Section 6.5. These verifications shall be maintained for at least five years. These test results shall be dated and shall contain the names, addresses, and telephone numbers of the companies responsible for system installation and testing." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {3969} The permittee shall maintain a copy of all test results. The test results shall be dated and shall contain the name, address, and telephone number of the company responsible for system installation and testing. [District Rule 4622]

Section 6.2.2 states "a person who performs repairs on any ARB certified Phase I or Phase II vapor recovery system shall provide to the owner or operator a repair log, which the owner or operator shall maintain on the premises for at least five years and which shall include all of the following:"

1) Date and time of each repair;
2) The name and applicable certification numbers of the person(s) who performed the repair, and, if applicable, the name, address and phone number of the person's employer;
3) Description of service performed;
4) Each component that was repaired, serviced, or removed;
5) Each component that was installed as replacement, if applicable;
6) Receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs.

Therefore, the following permit condition will be placed on the ATC to ensure compliance with these requirements:

- {3970} The permittee shall maintain on the premises a log of any repairs made to the certified Phase I or Phase II vapor recovery system. The repair log shall include the following: 1) date and time of each repair; 2) the name and applicable certification numbers of the person(s) who performed the repair, and if applicable, the name, address and phone number of the person's employer; 3) description of service performed; 4) each component that was repaired, serviced, or removed; 5) each component that was installed as replacement, if applicable; and 6) receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622]

Section 6.2.3 states "each operator who is required to perform periodic maintenance inspections under Section 5.3 shall maintain monthly gasoline throughput records on the premises for a minimum of five years, make them available on site during normal business hours to the APCO, ARB, or EPA, and submit them to the APCO, ARB, or EPA upon request." Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {4010} The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622]

- {3975} All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622]

Section 6.3.1 states "the owner or operator of a gasoline dispensing operation shall maintain an O&M Manual in accordance with Section 6.3."

Section 6.3.2 states "the O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request."

Section 6.3.3 states "the O&M manual shall, at a minimum, include the following current information:"

1) copies of all vapor recovery performance tests,
2) all applicable ARB Executive Orders, Approval Letters, and District Permits,
3) manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to applicable ARB Certification Procedures, and any additional instruction provided by the manufacturer,
4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests listed in Section 6.0. The owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements, and
5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components.

Section 6.3.4 states "owners or operators of gasoline dispensing operations shall document the periodic maintenance inspection program in the O&M manual." Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3919} The permittee shall implement a periodic maintenance inspection program for the certified Phase II vapor recovery system consistent with the requirements of this permit. The program shall be documented in an operation and maintenance (O&M) manual and shall at a minimum contain the following information: 1) copies of all vapor recovery performance tests; 2) all applicable ARB Executive Orders, Approval Letters, and District Permits; 3) the manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer; 4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests required by this permit (the owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements), and 5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622]

- {3971} The O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request. [District Rule 4622]

Section 6.4.1 states "operators shall comply with the ARB certified Phase II vapor recovery system performance tests specified in Sections 6.4.1.1 through 6.4.1.4 and shall conduct all applicable performance tests at start up and thereafter (no more than 30 days before or after the required compliance testing date) as required by the applicable ARB Executive Order and installation and operation manuals."

Section 6.4.1.1 states "conduct and pass a Static Leak Test of the ARB certified Phase II vapor recovery system at least once every twelve months."

Section 6.4.1.2 states "conduct and pass a Dynamic Back-Pressure Test of the ARB certified Phase II vapor recovery system at least once every five years except for those aboveground storage tanks that have integral dispensers (non-remote), unless otherwise required under the applicable ARB Executive Order." All balance Phase II systems require integral dispensers (top or side mounted). The only balance system that allows a non-integral dispenser is Petro Vault (G-70-130-A) and the maximum distance of the dispenser from the base of the tank is 2 feet which is not considered a remote dispenser. Therefore, balance Phase II systems cannot have a remote dispenser and thus no Dynamic Back-Pressure Test is required for balance Phase II systems.

Section 6.4.1.3 states "for ARB certified Phase II vapor recovery systems with bellows-less nozzles, conduct and pass, as applicable, an Air-to-Liquid Volume Ratio Test or a Vapor-to-Liquid Ratio Test at least once every six months."

Section 6.4.1.4 states "for ARB certified Phase II vapor recovery systems with a liquid removal device required by ARB Executive Orders, conduct and pass a Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid, or as required by the applicable ARB Executive Order. The amount of liquid in the vapor path shall be determined in accordance with the procedure specified in Section 5.3.4.4."

Section 6.4.2 states "the person responsible for conducting the tests specified in Section 6.4 shall use calibrated equipment meeting the calibration range and calibration intervals specified by the manufacturer, ARB Executive Order, or ARB test procedure."

Section 6.4.3 states "Persons responsible for conducting the tests specified in Section 6.5 shall be in full compliance with all provisions of Rule 1177 (Gasoline Dispensing Facility Tester Certification)." Therefore, the following permit condition will be placed on the ATC to ensure compliance with this requirement:

- {4005} A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622]

Section 6.4.4 states "each gasoline dispensing operation shall notify the District at least seven days prior to any performance testing."

Section 6.4.5 states "each ARB certified Phase II vapor recovery system shall be tested within 60 days of completion of installation or modification."

Section 6.5.1 states "tests shall be conducted in accordance with the latest version of the following ARB and EPA approved test methods, or their equivalents as approved by the EPA, and the APCO."

Section 6.5.1.2 states "Dynamic Back-Pressure Test, ARB TP-201.4"
Section 6.5.1.3 states "Air-to-Liquid Volume Ratio Test, ARB TP-201.5"
Section 6.5.1.4 states "Liquid Removal Test, ARB TP-201.6C"
Section 6.5.1.5 states "Static Leak Test for Aboveground Tanks, ARB TP-206.3 or TP-201.3B as applicable."

Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

- {3928} The permittee shall conduct all periodic vapor recovery system performance tests specified in this permit, no more than 30 days before or after the required compliance testing date, unless otherwise required under the applicable ARB Executive Order. [District Rules 4621 and 4622]

- {4741} For certified Phase II vapor recovery systems with liquid removal devices, the permittee shall perform and pass an ARB TP-201.6C Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid. The amount of liquid in the vapor path shall be measured by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. The vapor path shall be inspected according to the monitoring frequency as determined by monthly gasoline throughput. [District Rule 4622]

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is located within 1,000 feet of a school. However, pursuant to California Health and Safety Code 42301.6, since this project will not result in an increase in emissions, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001.

The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Consistent with California Environmental Quality Act (CEQA) and CEQA Guidelines requirements, the San Joaquin Valley Air Pollution Control District (District) has adopted procedures and guidelines for implementing CEQA. The District's Environmental Review Guidelines (ERG) establishes procedures for avoiding unnecessary delay during the District's permitting process while ensuring that significant environmental impacts are thoroughly and consistently addressed. The ERG includes policies and procedures to be followed when processing permits for projects that are exempt under CEQA.

The State Legislature granted a number of exemptions from CEQA, including projects that require only ministerial approval. Based upon analysis of its own laws and consideration of CEQA provisions, the District has identified a limited number of District permitting activities considered to be ministerial approvals. As set forth in §4.2.1 of the ERG, projects permitted consistent with the District's *Guidelines for Expedited Application Review* (GEAR) are standard application reviews in which little or no discretion is used in issuing Authority to Construct (ATC) documents.

For the proposed project, the District performed an Engineering Evaluation (this document) and determined that the project qualifies for processing under the procedures set forth in the District's Permit Services Procedures Manual in the Guidelines for Expedited Application Review (GEAR). Thus, as discussed above, this issuance of such ATC(s) is a ministerial approval for the District and is not subject to CEQA provisions.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful EPA Noticing period, issue Authority to Construct C-214-46-2 subject to the permit conditions on the attached draft Authority to Construct in Appendix D.

X. Billing Information

Annual Permit Fees		
Permit Number	Fee Schedule	Fee Description
C-214-46-2	3020-11-A	1 nozzle

Appendices

A: Current Permit to Operate
B: Supplemental Application
C: BACT Guideline and Analysis
D: Draft ATC
E: SSPE and GHG Calculations
F: Compliance Certification

Appendix A

Current Permit to Operate

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-214-46-1 **EXPIRATION DATE:** 08/31/2017

EQUIPMENT DESCRIPTION:
GASOLINE DISPENSING OPERATION WITH ONE 12,000 GALLON SPLIT (8,000 GALLON GASOLINE/4,000 GALLON DIESEL) ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM, AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162)

PERMIT UNIT REQUIREMENTS

1. Combined VOC emissions from permit units C-214 -16, -45 and -46, and C-4352-3, -14, -17, -18, and -19 shall not exceed 17,800 pounds per year based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Monthly records of the combined total emissions from units C-214-16, -45 and -46, and C-4352-3, -14, -17, -18, and -19 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Annual records of the combined total emissions from units C-214 -16, -45 and -46, and C-4352-3, -14, -17, -18, and -19 shall be maintained based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The vapor recovery systems and their components shall be operated, and maintained in accordance with the State certification requirements. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
5. Facility C-214 and C-4352 are the same stationary source for SJVAPCD permitting purposes. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Total combined emissions of NOx from facilities C-214 and C-4352 shall not exceed 49.9 tons/year based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 4622] Federally Enforceable Through Title V Permit
8. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo tank which attest to the vapor integrity of the tank. [District Rule 4621] Federally Enforceable Through Title V Permit
9. Vapor recovery systems and gasoline dispensing equipment shall be maintained leak-free. A "leak" is defined as the dripping of liquid volatile organic compounds at a rate of three or more drops per minute, or vapor volatile organic compounds in excess of 10,000 ppm as equivalent methane as determined by EPA Test Method 21. [District Rule 4622] Federally Enforceable Through Title V Permit
10. Any person conducting tests shall have completed a District-approved training program or the District's orientation class for testing and any subsequent required refresher class. [District Rule 4622] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. For certified Phase II vapor recovery systems with liquid removal devices, the permittee shall perform and pass an ARB TP-201.6 Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid. The amount of liquid in the vapor path shall be measured by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. The vapor path shall be inspected once per month if monthly throughput is below 2,500 gallons or once per week otherwise. [District Rule 4622] Federally Enforceable Through Title V Permit
12. The permittee shall perform and pass a Static Leak Test for Aboveground Tanks using ARB TP-201.3B at least once every 12 months. [District Rule 4622] Federally Enforceable Through Title V Permit
13. The operator shall implement a periodic maintenance inspection program for the certified Phase II vapor recovery system consistent with Section 5.4.2 of Rule 4622. The program shall be documented in an operation and maintenance (O&M) manual and shall at a minimum contain the following information: 1) All applicable ARB Executive Orders, Approval Letters, and District Permits; 2) The manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer; 3) System and/or component testing requirements, including test schedules and passing criteria for each of the standard tests. The owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements; 4) Protocol for performing periodic maintenance inspections including the components to be inspected and the defects requiring repair; and 5) Additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622] Federally Enforceable Through Title V Permit
14. The operator shall conduct periodic maintenance inspections based on the amount of gasoline dispensed by the facility in a calendar month as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rule 4622] Federally Enforceable Through Title V Permit
15. The operator shall maintain monthly gasoline throughput records. [District Rule 4622] Federally Enforceable Through Title V Permit
16. All records required by this permit shall be retained on-site for a period of at least five years, and shall be made available for inspection upon request. [District Rule 4622] Federally Enforceable Through Title V Permit
17. The operator shall maintain on the premises a log of any repairs made to the certified Phase I or Phase II vapor recovery system. The repair log shall include the following: 1) date and time of each repair; 2) the name of the person(s) who performed the repair, and if applicable, the name, address and phone number of the person's employer; 3) description of service performed; 4) each component that was repaired, serviced, or removed; 5) each component that was installed as replacement, if applicable; and 6) receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622] Federally Enforceable Through Title V Permit
18. The District shall be notified by the permittee 15 days prior to each test. The test results shall be submitted to the District no later than 30 days after each test. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The District shall be notified within 24 hours of the facility's pass/fail status after the performance of each test. [District Rule 1081] Federally Enforceable Through Title V Permit

Appendix B

Supplemental Application

C-1140310

San Joaquin Valley Unified Air Pollution Control District
Supplemental Application Form

GASOLINE DISPENSING

This form must be accompanied by a completed Application for Authority to Construct and Permit to Operate form.

Permit to be issued to: California State Prison - Corcoran (CSP-COR) ATTN.: Business Services	COPY TO: kathys@rumexcc.com
Facility Owner/ Operator's Name: California State Prison - Corcoran (CSP-COR)	Phone Number: (559) 992-7342
Current Permit to Operate number (if applicable): C-214-46-1	
I request that this project be processed in an expedited manner and waive my right to receive a written estimate of the evaluation fee, as required by District Rule 3010, Section 3.1.1.	☒ Yes ☐ No

Instructions

1	Complete a separate form for each tank and dispensing system which has a different type of Phase I or Phase II vapor recovery system with as much information as possible.
2	Attach a copy of the site plan showing underground fuel and vapor lines and location of dispenser islands. You may submit the drawings in electronic format.

Note: Information on Vapor Recovery Executive Orders is available online at: www.arb.ca.gov/vapor/vapor.htm

Gasoline Storage Tanks and Nozzles

Quantity of Tanks	Type of Tanks *(Check One for Each Tank)*	Capacity in Gallons *(Indicate if Split Tank)*	Type and Grade of Fuel
1	☐ Underground ☒ Aboveground*	12,000 Gal - Split	8,000 Gal Regular
	☐ Underground ☐ Aboveground*		4,000 Gal Diesel
	☐ Underground ☐ Aboveground*		
	☐ Underground ☐ Aboveground*		

Total Number of Gasoline Dispensers:	1	
Total Number of Gasoline Fueling Points:	1	*(Maximum number of vehicles which can be fueled at one time, normally two vehicles per dispenser)*
Total Number of Gasoline Dispensing Nozzles:	1	*(Do not include Diesel)*
# Grades of Gasoline Dispensed per Nozzle:	1	
Total Number of Vapor Recovery Instruction Signs:	1	*(Should be clearly readable from every fueling point)*
Maximum Facility Gasoline Throughput	Gallons per Month	46,000 Gallons per year
Facility Type	☐ Retail ☑ Non-Retail	

*For Aboveground Tanks (includes tanks in underground vaults)

Manufacturer:	Fireguard (S/N: 19305)	
CARB Executive Order Number:	G-70-162	

Phase I Vapor Recovery System

Manufacturer:	Morrison Brothers		
CARB Executive Order Number:	VR-402-B		
For VR-101 and VR-102 indicate fill configuration	☐ Single Fill ☐ Double Fill		
The proposed piping configuration is found in page	Exhibit	of Executive Order	

Component	Manufacturer	Model Number	Component Verified? (District Use Only)
Spill Containment Bucket (Product)	Morrison Brothers	515-0300 AC	☑
Spill Containment Bucket (Vapor)	Per E.O., 515 series remote spill container is not a vapor recovery component. -GillesK 2/25/14		☐
Debris Bucket (Product)			☐
Debris Bucket (Vapor)			☐
Non-Rotatable Adaptor (Product)	Morrison Brothers	927-0300AAEVR	☑
Non-Rotatable Adaptor (Vapor)	Morrison Brothers	323-0400AAEVR	☑
Drop Tube	Morrison Brothers	419-03101TEVR	☑
Dust Cap (Product)	Morrison Brothers	735DC-3000ACEVR	☑
Dust Cap (Vapor)	Morrison Brothers	323C-0100ACEVR	☑
Pressure/Vacuum Vent Valve			☐
Extractor Fitting			☐
Ball Float Vent Valve			☐
Additional Equipment Not Listed Above			
Emergency Vent, Overfill Prevention Valve, Stick Port Cap & Adaptor, Gauge Well Cap & Adapter Kit, & 3" Ball Valve	Morrison Brothers	✓244O-0700AVEVR, ✓9095A-3300AVEVR, 305GSP2000AKEVR, ✓305XPA1100AKEVR, & 691-1000	☑

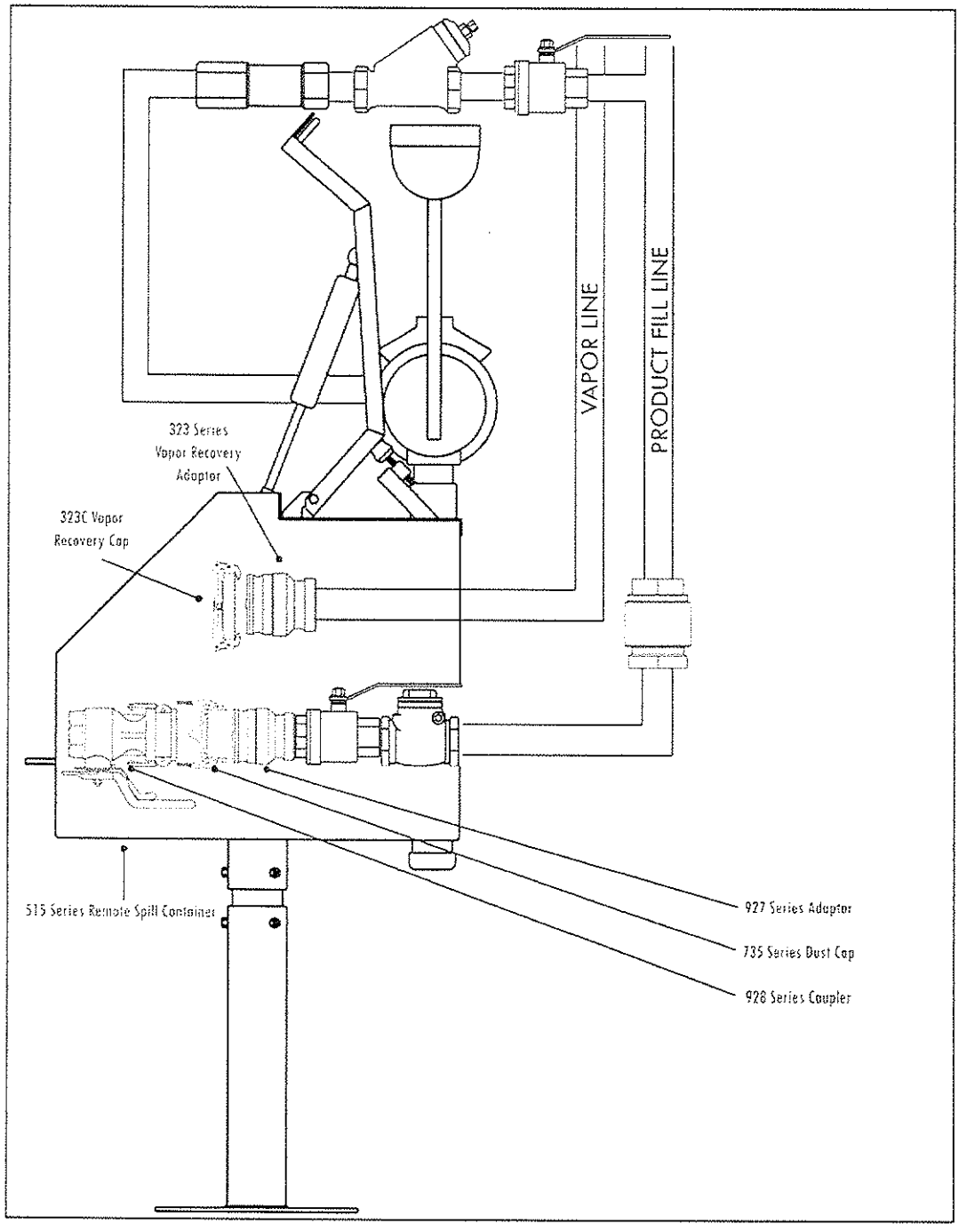
Phase II Vapor Recovery System

Manufacturer:	EXISTING		
System Type:	☐ Balance	☐ Vacuum Assist	☐ Burner
CARB Executive Order Number:	EXISTING		

Component	Manufacturer	Model Number	Component Verified? (District Use Only)
Nozzle	EXISTING	EXISTING	☐
Coaxial Hose	EXISTING	EXISTING	☐
Breakaway Fitting	EXISTING	EXISTING	☐
Dispenser	EXISTING	EXISTING	☐
Additional Equipment Not Listed Above			
			☐
			☐

Executive Order VR-402-B
Gilles R, 2/25/2014

Figure 2D
Typical Remote Fill Configuration of Morrison Bros. Phase I EVR System for AST
(Note: The remote spill container is not a vapor recovery component.)



Appendix C

BACT Guideline and Analysis

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 4.6.1*

Last Update: 4/14/2010

Motor Vehicle Gasoline Storage and Dispensing Operation

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	CARB certified Phase I and Phase II vapor recovery systems or CARB certified Phase I vapor recovery system with a vehicle fleet where 100% of the vehicles are equipped with Onboard Refueling Vapor Recovery (ORVR) systems and the operator also owns the gasoline dispensing operation that serves the fleet.		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in s a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source - Permit Specific BACT Determinations on Next Page(s)**

BACT Analysis for VOC Emissions:

Step 1 - Identify All Possible Control Technologies

Combined emission control system consisting of ARB certified Phase I and Phase II vapor recovery system.

Step 2 - Eliminate Technologically Infeasible Options

All control technologies listed in the clearinghouse are feasible.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

ARB certified Phase I and Phase II vapor recovery systems

Step 4 - Cost Effectiveness Analysis

A cost effectiveness analysis is not required when the applicant proposes the most effective control method identified as technologically feasible. A combined Phase I and Phase II vapor recovery system is identified as technologically feasible and achieved in practice BACT. Therefore, further cost effectiveness analysis is not required.

Step 5 - Select BACT

The applicant's proposed use of Phase I and Phase II vapor recovery for the control of VOC emissions satisfies District's BACT requirements.

Appendix D

Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-214-46-2

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: CALIF STATE PRISON - CORCORAN
MAILING ADDRESS: ATTN: BUSINESS SERV
PO BOX 8800
CORCORAN, CA 93212-8800

LOCATION: 4001 KING AVE
CORCORAN, CA 93212

EQUIPMENT DESCRIPTION:
MODIFICATION OF A GASOLINE DISPENSING OPERATION WITH ONE 12,000 GALLON SPLIT (8,000 GALLON GASOLINE/4,000 GALLON DIESEL) ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM, AND 1 FUELING POINT WITH 1 GASOLINE DISPENSING NOZZLE SERVED BY BALANCE PHASE II VAPOR RECOVERY SYSTEM (G-70-162): UPGRADE PHASE I VAPOR RECOVERY SYSTEM FROM TWO-POINT TO MORRISON BROTHERS EVR VR-402-B

CONDITIONS

1. Combined VOC emissions from permit units C-214 -16, -45 and -46, and C-4352-3, -14, -17, -18, and -19 shall not exceed 17,800 pounds per year based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Monthly records of the combined total emissions from units C-214-16, -45 and -46, and C-4352-3, -14, -17, -18, and -19 shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Annual records of the combined total emissions from units C-214 -16, -45 and -46, and C-4352-3, -14, -17, -18, and -19 shall be maintained based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

4. The Phase I, Phase II, and Standing Loss Control Vapor recovery systems shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Orders specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rules 4621 and 4622 and CH&SC 41950] Federally Enforceable Through Title V Permit
5. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 4622] Federally Enforceable Through Title V Permit
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. The storage container(s) shall be installed, maintained, and operated such that they are leak-free. [District Rule 4621] Federally Enforceable Through Title V Permit
8. The Phase I and Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
9. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration of total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit
10. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621] Federally Enforceable Through Title V Permit
11. No person shall operate any ARB certified Phase II vapor recovery system or any portion thereof that has a major defect or an equipment defect that is identified in any applicable ARB Executive Order until the following conditions have been met: 1) the defect has been repaired, replaced, or adjusted as necessary to correct the defect; 2) the District has been notified, and the District has reinspected the system or authorized the system for use (such authorization shall not include the authority to operate the equipment prior to the correction of the defective components); and 3) all major defects, after repair, are duly entered into the Operations and Maintenance (O&M) manual. [District Rule 4622] Federally Enforceable Through Title V Permit
12. Upon identification of any major defects, the permittee shall tag "Out-of-Order" all dispensing equipment for which vapor recovery has been impaired. Tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defective equipment has been repaired, replaced, or adjusted, as necessary. In the case of defects identified by the District, tagged equipment shall be rendered inoperable, and the tag shall not be removed until the District has been notified of the repairs, and the District has either reinspected the system or authorized the tagged equipment for use. [District Rule 4622] Federally Enforceable Through Title V Permit
13. The permittee shall implement a periodic maintenance inspection program for the certified Phase II vapor recovery system consistent with the requirements of this permit. The program shall be documented in an operation and maintenance (O&M) manual and shall at a minimum contain the following information: 1) copies of all vapor recovery performance tests; 2) all applicable ARB Executive Orders, Approval Letters, and District Permits; 3) the manufacturer's specifications and instructions for installation, operation, repair, and maintenance required pursuant to ARB Certification Procedure CP-201, and any additional instruction provided by the manufacturer; 4) system and/or component testing requirements, including test schedules and passing criteria for each of the standard tests required by this permit (the owner/operator may include any non-ARB required diagnostic and other tests as part of the testing requirements), and 5) additional O&M instructions, if any, that are designed to ensure compliance with the applicable rules, regulations, ARB Executive Orders, and District permit conditions, including replacement schedules for failure or wear prone components. [District Rule 4622] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

14. The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

15. Periodic maintenance inspections of the Phase I vapor recovery system shall include, at a minimum, verification that 1) the fill caps and vapor caps are not missing, damaged, or loose; 2) the fill cap gasket and vapor cap gaskets are not missing or damaged; 3) the fill adapter and vapor adapter are securely attached to the risers; 4) where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing; 5) the dry break (poppet-valve) is not missing or damaged; and 6) the submerged fill tube is not missing or damaged. [District Rule 4621] Federally Enforceable Through Title V Permit

16. Periodic maintenance inspections of the Phase II vapor recovery system shall include, at a minimum, verification that 1) the following nozzle components are in place and in good condition as specified in ARB Executive Order as applicable: faceplate/facecone, bellows, latching device spring, vapor check valve, spout (proper diameter/vapor collection holes), insertion interlock mechanism, automatic shut-off mechanism, and hold open latch (unless prohibited by law or the local fire control authority); 2) the hoses are not torn, flattened or crimped; 3) the vapor path of the coaxial hoses associated with bellows equipped nozzles does not contain more than 100 ml of liquid if applicable; and 4) the vapor processing unit is functioning properly, for operations that are required to have or possess such a unit. [District Rule 4622] Federally Enforceable Through Title V Permit

17. In the event of a separation due to a drive off, the permittee shall, unless otherwise specified in the applicable ARB Executive Order, conduct a visual inspection of the affected equipment and either 1) perform qualified repairs on any damaged components and conduct applicable re-verification tests pursuant to the requirements of this permit, or 2) replace the affected nozzles, coaxial hoses, breakaway couplings, and any other damaged components with new or certified rebuilt components that are ARB certified. The activities shall be documented in accordance with the requirements of this permit before placing the affected equipment back in service. [District Rule 4622] Federally Enforceable Through Title V Permit

18. The gasoline throughput for this permit unit shall not exceed 657,000 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit

19. The permittee shall conduct all periodic vapor recovery system performance tests specified in this permit, no more than 30 days before or after the required compliance testing date, unless otherwise required under the applicable ARB Executive Order. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

20. The permittee shall perform and pass a Static Leak Test "Determination of Static Pressure Performance of Vapor Recovery Systems at Gasoline Dispensing Facilities with Aboveground Tanks" in accordance with the Executive Order specified in this permit for the Phase I Vapor Recovery System within 60 days after initial start-up and at least once every 12 months thereafter. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

21. For certified Phase II vapor recovery systems with liquid removal devices, the permittee shall perform and pass an ARB TP-201.6C Liquid Removal Test whenever the liquid in the vapor path exceeds 100 ml of liquid, or as required by the applicable ARB Executive Order. The amount of liquid in the vapor path shall be measured by lowering the gasoline dispensing nozzle into a container until such time that no more liquid drains from the nozzle. The amount of liquid drained into the container shall be measured using a graduated cylinder or graduated beaker. The vapor path shall be inspected according to the monitoring frequency as determined by monthly gasoline throughput. [District Rule 4622] Federally Enforceable Through Title V Permit

22. If a Liquid Condensate Trap is installed, the permittee shall perform and pass a Liquid Condensate Trap Compliance Test using the test procedure defined in the Executive Order specified in this permit for the Phase II Vapor Recovery System within 60 days after initial startup and at least once every 12 months thereafter. [District Rule 4622] Federally Enforceable Through Title V Permit

23. If a Liquid Condensate Trap is installed it shall be (1) maintained without leaks; (2) accessible for inspection upon request; (3) capable of automatic evacuation of liquid; and (4) equipped with an alarm system in case of failure of the evacuation system. [District Rule 4622] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

25. A person performing installation of, or maintenance on, a certified Phase I or Phase II vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

26. Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

27. The permittee shall notify the District at least 7 days prior to each performance test. The test results shall be submitted to the District no later than 30 days after the completion of each test. [District Rule 4621] Federally Enforceable Through Title V Permit

28. The permittee shall maintain a copy of all test results. The test results shall be dated and shall contain the name, address, and telephone number of the company responsible for system installation and testing. [District Rule 4622] Federally Enforceable Through Title V Permit

29. The permittee shall maintain on the premises a log of any repairs made to the certified Phase I or Phase II vapor recovery system. The repair log shall include the following: 1) date and time of each repair; 2) the name and applicable certification numbers of the person(s) who performed the repair, and if applicable, the name, address and phone number of the person's employer; 3) description of service performed; 4) each component that was repaired, serviced, or removed; 5) each component that was installed as replacement, if applicable; and 6) receipts or other documents for parts used in the repair and, if applicable, work orders which shall include the name and signature of the person responsible for performing the repairs. [District Rule 4622] Federally Enforceable Through Title V Permit

30. The O&M manual shall be kept at the dispensing operation and made available to any person who operates, inspects, maintains, repairs, or tests the equipment at the operation as well as to District personnel upon request. [District Rule 4622] Federally Enforceable Through Title V Permit

31. The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

32. All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 4621 and 4622] Federally Enforceable Through Title V Permit

Appendix E

SSPE and GHG Calculations

Facility Number:	C-214
Facility Name:	California State Prison - Corcoran
Project Number:	C-1140310
Date:	2/25/2014
By:	GillesR

Calculation of PSD Major Source PE

SSPE2 from Project C-1113296; includes units from both facility C-214 and facility C-4352

	NOx	SOx	PM10	CO	VOC	GHG
SSPE2 (lb/year)	21,255	1,068	16,958	29,688	20,493	---
SSPE2 (ton/year)	10.6	0.5	8.5	14.8	10.2	831.8
PSD Major Source Threshold (ton/year)	250	250	250	250	250	100,000
PSD Major Source?	No	No	No	No	No	No

Assumptions

2,542.50 Btu/bhp-hr	30% Engine Efficiency			
Heat Input =	(Engine bhp x 2,542.5 Btu/bhp-hr) / (Engine Efficiency * 1E6 Btu/MMBtu)			
1 therm =	100,000	BTU or	0.1	MMBtu

Emission Factors (EF) and Global Warming Potentials (GWP)

Greenhouse Gas (GHG) Emission Factors from Tables C-1 and C-2 to Subpart C of Part 98, Title 40, CFR, 1/29/2014
Global Warming Potential (GWPs) from Table A-1 to Subpart A of Part 98, Title 40, CFR, 1/29/2014

	EF CO2		EF CH4		EF N2O	
Fuel Type	kg/MMBtu	lb/MMBtu	kg/MMBtu	lb/MMBtu	kg/MMBtu	lb/MMBtu
Natural Gas	53.06	116.98	0.001	0.0022	0.0001	0.00022
LPG	61.71	136.05	0.003	0.0066	0.0006	0.0013
Diesel	73.96	163.05	0.003	0.0066	0.0006	0.0013

Name	Chemicl Formula	GWP
Carbon dioxide	CO2	1
Methane	CH4	25
Nitrous oxide	N2O	298

Calculations:

Internal Combustion Engines

Permit Unit	Power Rating (bhp)	Fuel Type	Annual Operation (hr/yr)	Heat Input (MMBtu/hr)	EF CO2 (lb/MMBtu)	EF CH4 (lb/MMBtu)	EF N2O (lb/MMBtu)	GWP CH4 (lb-CO2e/lb-CH4)	GWP N2O (lb-CO2e/lb-N2O)	PE GHG (ton-CO2e/yr)	PE GHG (metric ton-CO2e/yr)
C-214-1-3	188	diesel	100	1.59	163.05	0.0066	0.0013	25	298	13.0	11.8
C-214-9-3	1490	diesel	20	12.63	163.05	0.0066	0.0013	25	298	20.7	18.7
C-214-10-3	1490	diesel	20	12.63	163.05	0.0066	0.0013	25	298	20.7	18.7
C-214-11-3	1490	diesel	20	12.63	163.05	0.0066	0.0013	25	298	20.7	18.7
C-214-12-3	1593	diesel	40	13.50	163.05	0.0066	0.0013	25	298	44.2	40.1
C-214-13-3	390	diesel	20	3.31	163.05	0.0066	0.0013	25	298	5.4	4.9
C-4352-1-2	2876	diesel	40	24.37	163.05	0.0066	0.0013	25	298	79.8	72.4
C-4352-5-2	2876	diesel	40	24.37	163.05	0.0066	0.0013	25	298	79.8	72.4
C-4352-6-2	2876	diesel	40	24.37	163.05	0.0066	0.0013	25	298	79.8	72.4
C-4352-7-2	2876	diesel	40	24.37	163.05	0.0066	0.0013	25	298	79.8	72.4
C-4352-13-2	896	diesel	40	7.59	163.05	0.0066	0.0013	25	298	24.8	22.5
C-4352-20-1	300	diesel	100	2.54	163.05	0.0066	0.0013	25	298	20.8	18.9
									Facility Total GHG Emissions	**489.3**	**ton-CO2e/year**

Boilers

Permit Unit	Input Heat Rating (MMBtu/hr)	Fuel Type	Annual Operation (hr/yr)	Heat Input (MMBtu/yr)	EF CO2 (lb/MMBtu)	EF CH4 (lb/MMBtu)	EF N2O (lb/MMBtu)	GWP CH4 (lb-CO2e/lb-CH4)	GWP N2O (lb-CO2e/lb-N2O)	PE GHG (ton-CO2e/yr)	PE GHG (metric ton-CO2e/yr)
C-214-4-7	43	natural gas	8,712	0.36	116.98	0.0022	0.0002	25	298	185.9	168.6
C-214-4-7 (backup fuel)	43	diesel	48	0.36	163.05	0.0066	0.0013	25	298	1.4	1.3
C-214-5-7	27	natural gas	8,712	0.23	116.98	0.0022	0.0002	25	298	116.7	105.9
C-214-5-7 (backup fuel)	27	diesel	48	0.23	163.05	0.0066	0.0013	25	298	0.9	0.8
C-214-32-6	8.1	natural gas	8,760	0.07	116.98	0.0022	0.0002	25	298	35.2	31.9
C-214-45-3	1.75	natural gas	1,022	0.01	116.98	0.0022	0.0002	25	298	0.9	0.8
C-4352-4-2	80	LPG	8	0.68	136.05	0.0066	0.0013	25	298	0.4	0.3
C-4352-17-3	1.165	natural gas	1,606	0.01	116.98	0.0022	0.0002	25	298	0.9	0.8
									Facility Total GHG Emissions	**342.3**	**ton-CO2e/year**

Pre-Project Facility GHG Emissions:

Permit Unit	PE GHG
C-214-1-3	13.0
C-214-9-3	20.7
C-214-10-3	20.7
C-214-11-3	20.7
C-214-12-3	44.2
C-214-13-3	5.4
C-4352-1-2	79.8
C-4352-5-2	79.8
C-4352-6-2	79.8
C-4352-7-2	79.8
C-4352-13-2	24.8
C-4352-20-1	20.8
C-214-4-7	185.9
C-214-4-7 (backup fuel)	1.4
C-214-5-7	116.7
C-214-5-7 (backup fuel)	0.9
C-214-32-6	35.2
C-214-45-3	0.9
C-4352-4-2	0.4
C-4352-17-3	0.9
Total GHG =	**831.8** **ton-CO2e/yr**

Appendix F

Compliance Certification

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

[ ] SIGNIFICANT PERMIT MODIFICATION
[✓] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: California State Prison - Corcoran (CSP-COR)	FACILITY ID: C-214-46-1
1. Type of Organization:[ ] Corporation [ ] Sole Ownership [X] Government [ ] Partnership [ ] Utility	
2. Owner's Name: Aaron Jones	
3. Agent to the Owner: Equipment Maintenance Supervisor	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

(AJ) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

(AJ) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

(AJ) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(AJ) Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Aaron Jones
Signature of Responsible Official

2/11/14
Date

AARON JONES
Name of Responsible Official (please print)

EMS
Title of Responsible Official (please print)